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*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HOFBRÄUHAUS OF AMERICA, LLC, a  
Nevada limited liability company,

Plaintiff,

v.

OAK TREE MANAGEMENT SERVICES,  
INC., a Missouri corporation, WILLIAM  
GUY CROUCH, as Successor in Interest or  
Receiver for Oak Tree Management  
Services, Inc.,

Defendants.

Case No. 2:22-cv-00421-JAD-DJA

**~~PROPOSED~~ STIPULATION AND  
ORDER FOR EXTENSION OF TIME  
TO FILE A STIPULATED  
DISCOVERY PLAN AND  
SCHEDULING ORDER**

**(FIRST REQUEST)**

Plaintiff Hofbräuhaus of America, LLC (“Hofbräuhaus”), and Defendant William  
Guy Crouch, as Court-Appointed Receiver (the “Receiver”) for Oak Tree Management  
Services, Inc. (“Oak Tree,” and collectively with Hofbräuhaus and the Receiver, the  
“Parties”), by and through undersigned counsel, hereby stipulate and agree to a seven (7) day  
extension of time of the original deadline of May 13, 2022 [ECF No. 10] for the Parties to file  
a Stipulated Discovery Plan and Scheduling Order (“DPSO”), through and including the new  
deadline of May 20, 2022.

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1 In support of this Stipulation, the Parties respectfully state as follows:

2 1. The Parties have been engaged in extensive motion practice related to  
3 Hofbräuhaus's Emergency Motion for Preliminary Injunction [ECF No. 18] and the  
4 Receiver's Motion to Dismiss, Stay, or Transfer Amended Complaint [ECF No. 27]. The  
5 briefing with respect to said motions has addressed numerous factual and legal issues, and has  
6 required considerable time and effort to prepare. The last reply brief is due on May 13, 2022  
7 [ECF No. 34.]

8 2. In light of the foregoing, the Parties have not yet held a Rule 26(f) conference.

9 3. Due to scheduling conflicts, including counsel for the Receiver's law firm,  
10 counsel for the Parties are not available to hold a Rule 26(f) conference before the current  
11 deadline to file the DPSO of May 13, 2022.

12 4. The Parties have agreed to a seven (7) day extension of time of the original  
13 deadline of May 13, 2022, to hold a Rule 26(f) conference and file the DPSO, through and  
14 including the new deadline of May 20, 2022. The Parties respectfully request that the Court  
15 grant this brief extension request.

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WHEREFORE, IT IS HEREBY STIPULATED by and between the Parties that they shall have a seven (7) day extension of time to hold a Rule 26(f) conference and file the DPSO, through and including May 20, 2022.

Dated this 11th day of May 2022.

Dated this 11th day of May 2022.

HONE LAW

SEMENZA KIRCHER RICKARD

/s/Eric D. Hone

/s/ Jarrod L Ricard

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*Attorneys for Defendants  
William Guy Crouch, as Receiver for  
Oak Tree Management Services, Inc.*

IT IS SO ORDERED:



DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: May 12, 2022

